EXHIBIT A

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK	
ROBERT BARTLETT <i>et al.</i> ,	
Plaintiffs,	Case No. 19-cv-7 (CBA)(TAM)
-against-	
SOCIÉTÉ GÉNÉRALE DE BANQUE AU LIBAN SAL : et al.,	
Defendants. :	,

[PROPOSED] DOCUMENT PRODUCTION ORDER

Following entry of the March 31, 2023, Memorandum & Order granting Plaintiffs' motion to compel production and denying Defendants' motion for a protective order in part, ECF No. 320, and the Lebanese authorities' subsequent denial of the Letter Rogatory issued by this Court on August 14, 2023, ECF No. 421-1, each Defendant (except where specified otherwise) is hereby ordered to produce the following records:

- 1. All electronic communications² (including electronic mail, text messages and internal bank messaging systems)³ concerning Hezbollah for the time period between January 1, 2003, through December 31, 2012.
- 2. For persons and entities listed in Appendix A, the following electronically maintained categories of documents to the extent that such persons and entities were customers of a Defendant at any time during the time period between January 1, 2003, through December 31, 2011:
 - a. Account opening records, including account applications and signature cards;
 - b. Customer notifications and correspondence;

For purposes of this Order, Defendants are (1) Société Générale de Banque au Liban S.A.L. ("SGBL"), (2) Fransabank S.A.L., (3) MEAB Bank S.A.L., (4) BLOM Bank S.A.L., (5) Byblos Bank S.A.L., (6) Bank Audi S.A.L., (7) Bank of Beirut S.A.L., (8) Lebanon & Gulf Bank S.A.L. ("LGB"), (9) Banque Libano-Française S.A.L., (10) Bank of Beirut and the Arab Countries S.A.L., and (11) Fenicia Bank S.A.L.

The definitions in Rule 26.3 of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York (the "Local Rules") shall apply to all applicable terms.

[&]quot;Internal bank messaging systems" shall include: SWIFT messaging systems; internal chat or messaging platforms; collaboration tools and shared workspaces; and electronic banking systems with messaging capabilities.

- c. Documents sufficient to disclose each account number; and
- d. All documents reflecting the identity of those having authority over, or holding any beneficial interest in, each account.
- 3. For persons and entities listed in Appendix A, the following electronically maintained categories of documents for the time period between January 1, 2003, through December 31, 2011, to the extent that such persons and entities were customers of a Defendant at any time during that time period:
 - a. All statements of accounts for each account;
 - b. All SWIFT messages involving each account;
 - c. Transaction records;
 - d. Loan documentation;
 - e. Investment records; and
 - f. Safety deposit box records.
- 4. For persons and entities listed in Appendix B, the following electronically maintained categories of documents to the extent that such persons and entities were customers of a Defendant at any time during the time period between January 1, 2003, through December 31, 2012:
 - a. Account opening records, including account applications and signature cards;
 - b. Customer notifications and correspondence;
 - c. Documents sufficient to disclose each account number; and
 - d. All documents reflecting the identity of those having authority over, or holding any beneficial interest in, each account.
- 5. For persons and entities identified in Appendix B as holding accounts that migrated from Lebanese Canadian Bank ("LCB"), the following communications and documents for the time period between February 10, 2011, through December 31, 2012, to the extent not encompassed in other requests:
 - a. Customer notifications and correspondence;
 - b. Account mapping and reconciliation records;
 - c. All due diligence and account transfer documentation;
 - d. Internal communications regarding LCB; and

- e. Any risk assessments of acquired LCB customers.
- 6. For persons and entities listed in Appendix B, the following electronically maintained categories of documents for the time period between January 1, 2003, through December 31, 2012, to the extent that such persons and entities were customers of a Defendant at any time during that time period:
 - a. All statements of accounts for each account;
 - b. All SWIFT messages involving each account;
 - c. Transaction records;
 - d. Loan documentation;
 - e. Investment records; and
 - f. Safety deposit box records.
- 7. For persons and entities listed in Appendix A, all electronically maintained communications for the time period between January 1, 2003, through December 31, 2011, to the extent that such persons and entities were customers of a Defendant at any time during that time period:
 - a. Electronic mail;
 - b. Text messages;
 - c. SWIFT free-format messages (i.e., MT–199, MT–299, MT–999); and
 - d. Internal bank messaging systems.
- 8. For persons and entities listed in Appendix B, all electronically maintained communications for the time period between January 1, 2003, through December 31, 2012, to the extent that such persons and entities were customers of a Defendant at any time during that time period:
 - a. Electronic mail;
 - b. Text messages;
 - c. SWIFT free-format messages (i.e., MT-199, MT-299, MT-999); and
 - d. Internal bank messaging systems.
- 9. For persons and entities listed in Appendix A, all compliance records for the time period between January 1, 2003, through December 31, 2011, to the extent that such persons and entities were customers of a Defendant at any time during that time period, including:
 - a. Electronic mail, text messages and internal bank messaging systems;

- b. Written memoranda, internal reports and correspondence;
- c. KYC documentation;
- d. Enhanced due diligence documentation;
- e. Communications with Lebanese and U.S. regulators;
- f. Transaction monitoring; and
- g. Customer risk profiles.
- 10. For persons and entities listed in Appendix B, all compliance records for the time period between January 1, 2003, through December 31, 2012, to the extent such persons and entities were customers of a Defendant during such time period, including:
 - a. Electronic mail, text messages and internal bank messaging systems;
 - b. Written memoranda, internal reports and correspondence;
 - c. KYC documentation;
 - d. Enhanced due diligence documentation;
 - e. Communications with Lebanese and U.S. regulators;
 - f. Transaction monitoring; and
 - g. Customer risk profiles.
- 11. For persons and entities listed in Appendix B as holding accounts that migrated from LCB, the following communications and documents for the time period between February 10, 2011, through December 31, 2012, to the extent not encompassed in other requests:
 - a. Post-transfer monitoring records through December 31, 2012;
 - b. Enhanced due diligence procedures;
 - c. Special monitoring protocols;
 - d. Risk rating assessments; and
 - e. Communications with Lebanese and U.S. regulators
- 12. From SGBL, all communications and documents concerning SGBL's acquisition of LCB.

- 13. From SGBL, all communications and documents concerning former bank accounts and customers of LCB identified in the audit(s) described in paragraphs 108-119 of the Third Amended Complaint.
- 14. From SGBL, Byblos Bank, Fenicia Bank, LGB and MEAB Bank, all electronic communications (including electronic mail, text messages and internal bank messaging systems) concerning Al Qard al Hasan and/or its employees Husayn al-Shami, Wahid Mahmud Sbeiti, Adel Muhammad Mansour, Hassan Chehadeh Othman, Abbas Hassan Gharib a/k/a Abbas Ghorayeb, Mustafa Habib Harb, Ezzat Youssef Akar, Ahmad Mohamad Yazbeck, and Ghassan Haidar, to the extent not encompassed by the requests above.

IT IS SO ORDERED.	
Date:	
	TARYN A. MERKL
	UNITED STATES MAGISTRATE JUDGE

APPENDIX A

### Record Factors Person	inppendix ii	
المال	Name of Persons/Enities	Paragraph Number
الماس	Persons	
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Salmen Ali Ahmed (ملحان علي المعلى المعال (ملحان المعال ا	Said Ali Ahmad a/k/a Sa'id `Ali Ahmad (سعيد على احمير)	1026
Sleiman Ali Ahmad a/k/a Yusuf Ali Ahmad (الورس على المحالة ال		
المرسل على المجاهرة		
Abda 1-Tlah Mahmud Ashur a/k/a Abd-al-Alah Mahmud Ashur a/k/a Abdel Tlah Mahmud Ashur a/k/a Abdel Tlah Mahmud Ashur a/k/a Abdel Tlah Mahmud Ashur a/k/a Busayn 'Ali Atawi (عبين على علوي) 1889 Rim Reda Baqir a/k/a Rim Baker a/k/a Rim Baqer a/k/a Rim Reda (عبين) 1046 Rim Reda Baqir a/k/a Rim Baker a/k/a Rim Baqer a/k/a Wa'i Jalal Bitar a/k/a Wa'i Jalal		
Mahmoud Achour (معلى الالمالة المستقد على الالمالة المستقد على الالمالة المستقد المست		1073
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Rim Reda Baqir a/k/a Rim Baker a/k/a Rim Baqer a/k/a Rim Reda (اديا والله المالة الما	Abdul Hamid Assi	1787
Rim Reda Baqir a/k/a Rim Baker a/k/a Rim Baqer a/k/a Rim Reda (اديا والله المالة الما	Hussein Ali Atwi a/k/a Husayn 'Ali Atawi (حسين على عطوى)	1889
Talal Khalil Chahine a/k/a Talal Shahin a/k/a Tilal Khalil Shahin (العبل شامول العبل المعادل العبل المعادل العبل المعادل العبل العبل المعادل العبل ال	-	1046
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Hassan Said Farran a/k/a Hasan Sa'id Faran (ديل علي الله المعالم المع	Talal Khalil Chahine a/k/a Talal Shahin a/k/a Tilal Khalil Shahin (طلال	596, 853, 1887
Rana Hachem a/k/a Rana Hashem (رنا عافم) Ghassan Haidar Ghay Khadir Ali Abi Haidar a/k/a Kader 'Ali Abi Haydar (دويب حالي والله الله الله الله الله الله الله الل		715
### Rhadir Ali Abi Haidar a/k/a Kader 'Ali Abi Haydar (ديب ماني حرب) 1858 ### Dib Hani Harb a/k/a Deeb Hani Harb (ديب ماني حرب) 1346, 1910 #### Hisham Hussein Makke a/k/a Hisham Hussein Makki a/k/a Hisham Husayn Makke a/k/a Hisham Hussein Makki a/k/a Hisham Husayn Makke a/k/a Hisham Mackie #### Jamal Makke a/k/a Jamal Makki a/k/a Jamal Ali Makke (حيال علي معلى المالية المعلى المعل		
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### Hisham Hussein Makke a/k/a Hisham Hussein Makki a/k/a Hisham Husayn Makke a/k/a Hisham Mackie Jamal Makke a/k/a Jamal Makki a/k/a Jamal Ali Makke (جومانا مال الله المحلوب المعلق	Khadir Ali Abi Haidar a/k/a Kader 'Ali Abi Haydar (خضر علي ابي حيدر)	1858
### Hisham Hussein Makke a/k/a Hisham Hussein Makki a/k/a Hisham Husayn Makke a/k/a Hisham Mackie Jamal Makke a/k/a Jamal Makki a/k/a Jamal Ali Makke (جومانا مال الله المحلوب المعلق	Dib Hani Harb a/k/a Deeb Hani Harb (دید هانے حرب)	1346, 1910
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A/k/a Attiyah Tabajah a/k/a Atiya Muhammad Abbas (عطيه معمد عباس) Hassan Ali Abbas Taleb Muhammad Ali Abou-Zeinab (بوننب) Abdel Karim Youssef Ahmad a/k/a Abd al-Karim Yusuf Ahmad (پوسف احمد احمد) Afif Ahmad Ahmad a/k/a Afif Ahmad Ali Ahmad (عفيف احمد احمد) Afif Ahmad Ahmad a/k/a Afif Ahmad Ali Ahmad (عفيف احمد احمد) Ali Ahmad Ahmad a/k/a 'Ali Ahmed Ahmed (على احمد احمد) Ali Sa'id Ali Ahmad a/k/a Ali Said Ali Ahmad a/k/a 'Ali Said Ali Ahmed (على سعيد على احمد) Assan Ahmad Diana Nassour Ahmad a/k/a Diana Nassour (ديانا نصور) Hassan Said Ali Ahmad a/k/a Hassan Sa'id Ali Ahmad (ديانا احمد على احمد) Ino6 Imad Suleiman Ahmad a/k/a 'Imad Suleiman Ahmad (احمد) Hismahan Ahmad Ahmad a/k/a Hismahan Ahmad Ali Ahmad (احمد) Lina Ahmad Ahmad a/k/a Lina Ahmad Ali Ahmad (احمد) Lina Ahmad Ahmad a/k/a Lina Ahmad Ali Ahmad (الحمد على احمد) Lina Ahmad Ahmad a/k/a Lina Ahmad Ali Ahmad (الينا احمد على احمد)	Hassan Ali Tajideen a/k/a Hassan Ali Taj al-Din	574, 766, 776, 811
Taleb Muhammad Ali Abou-Zeinab (طالب معمد علي ابو زيند) Abdel Karim Youssef Ahmad a/k/a Abd al-Karim Yusuf Ahmad (عبد الكريم) Afif Ahmad Ahmad a/k/a Afif Ahmad Ali Ahmad (علي احمد احمد) Ali Ahmad Ahmad a/k/a 'Ali Ahmad Ahmad Ahmad a/k/a 'Ali Said Ali Ahmad Ali Ali Said Ali Ahmad Ali Ahmad Ali Ali Almad Ali Ahmad Ali Almad Almad Ali Almad Al		714
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Muhammad Khadir Mattar	715
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Ahmad Izzat Khalil Muhammad a/k/a Ahmad Izzat Khalil Mohamad a/k/a Ahmad Izzat Khalil Mohammad	715
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Abdul Menhem Ibrahim Nassour a/k/a Abd-al-Mun'im Ibrahim Nassur (عبد)	984
(علي إبراهيم نصور) Ali Ibrahim Nassour	984
(عزیز ابراهیم نصور) Aziz Ibrahim Nassour	971
Batul Hassan Youssef Nassour a/k/a Batul Hassan Youssef a/k/a Batul (بـتول حسن پـوسف) Hasan Yusuf	980, 1028
ابراهیم خلیل نصور) Ibrahim Khalil Nassour	971
(خلیل ابراهیم نصور) Khalil Ibrahim Nassour	971
(محمد ابراهیم نصور) Muhammad Ibrahim Nassour	971
Imad Chukrallah Nasrallah (عماد شكرلله نصرله) a/k/a Emad Shukralla Nasralla (عماد شكر لله نصر لله)	908, 909
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Muhammad Haidar Qansu a/k/a Muhammad Haidar Kanso a/k/a Muhammad Haidar (محمد حبدر قانصو)	485
Abd Al Menhem Qubaysi a/k/a Abd al-Mun'im al-Qubaysi a/k/a Abd al-Mumin Qubaysi a/k/a Abd Al Menhem Kobeissi a/k/a Abd Al Munhim Kubaysy a/k/a Abdul Menhem Kobeissi a/k/a Abdel Menhem Kobeissi a/k/a Abdel Menhem Kobeissi (عبد المؤمن القبيسي; عبد المنعم القبيسي)	962
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Abdallah Hassan Romani	714
Muhammad Abd Ali Rustam a/k/a Mohammad Abd Ali Rustum a/k/a Mohamad Abd Ali Rostom a/k/a Mohamad Abd Ali Rostom a/k/a Mohamad Abd Ali Rostam (محمد عبد على رستم)	1092, 1101
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Ahmed Safa a/k/a Hessam Badr al-Din a/k/a Hessam Badreddine a/k/a Ali	110
Wahib al-Zayn a/k/a Ali Waheb al-Zein (وفيق صفا)	
Ashraf Asssem Safieddine	886
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Safieddine a/k/a Hamza Ali Safieddine	621
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Oussama Salhab a/k/a Usama Salhab a/k/a Osama Salhab	1555
Adel Mahmud Salim	473
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Rita Hassam Abu Samra	714
Sobhi Mohamed Saqr a/k/a Sobhi Sakr (مبحي محمد صقر)	633, 728
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Rauf Ali Shaito a/k/a Rauf Ali Sha'itu a/k/a Raouf Ali Shaito a/k/a Rauf	714
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Zainab Khalil Shaito	715
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Ali Saleh Shuaib	714
Wahid Mahmud Subayti a/k/a Wahid Sbeity a/k/a Wahid Sbeiti (وحید محمود)	1607
اسبینی Hassan Ali Suwaydan a/k/a Hasan `Ali Suwaidan (سحن علي سويـدان)	776
nassan Ali Suwaydan a/k/a nasan 'Ali Suwaldan (اسخن عني سويدان) (على ادهم طباجه) Ali Adham Tabaja a/k/a Ali Adham Tabajah	715
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Ahmad Muhammad Tajideen a/k/a Ahmad Muhammad Taj al-Din (أحمد تاج الدين)	788
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Jaffar Muhammad Tajideen a/k/a Jaffar Muhammad Taj al-Din (جعفر محمد تاج (الدین)	803, 804
Mahmoud Muhammad Tajideen a/k/a Mahmoud Muhammad Taj al-Din (محمود صحمد)	806
Nadin Hassan Tajideen a/k/a Nadin Hassan Taj al-Din a/k/a Nadine Hassan Tajideen	766
Qassem Hassan Tajideen	803
Samiha Ibrahim Tajideen a/k/a Samiha Ibrahim Taj al-Din (سمیحة ابراهیم (تاج الدین	776
Ali Youssef Tarhini	886, 896
Muhammad Tarhini a/k/a Al Sayed Bilal (محمد ترحيني / السيد بلال)	896
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(عماد رامز وزني) Imad Ramez Wazani a/k/a Imad Ramez Wazne	714, 715
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Saeed Ahmad a/k/a Nizam Saed 'Ali Ahmad a/k/a Narem Saied Ahmad (اعلم سبي على المنافر			Persons
Saleh Ali Assi a/k/a Salih Ali Assi a/k/a Salih Ali Assi a/k/a Salih Ali Asi a/k/a Salih Ali Youssef Sharara a/k/a 'Ali Yusuf Sharara (a/k/a Adham Husayn 732 Adham Husayn 732 Adham Husasin Tabaja a/k/a Adham Tabaja a/k/a Adham Husayn 732 Adham Husayn 733 Adham Ali Salih Ali Asi a/k/a Salih Ali Asi a/k/a Salih Ali Asi a/k/a Salih Ali Asi a/k/a Adham Husayn 732 Amin Shara a/k/a Ami	029	1029	a/k/a Nazem
Adham Hussein Tabaja a/k/a Adham Tabajah a/k/a Adham Husayn Tabaja a/k/a Nama Adham Husayn Tabaja a/k/a Nama Adham Husayn Tabaja a/k/a Nama Adham Husayn Tabaja a/k/a Adham Husayn Tabaja a/k/a Adham Husayn Tabaja a/k/a Adham Husayn Tabaja a/k/a Adham Husayn Adham Adhamad Afaa a/k/a Nisam Amhaz a/k/a Nisam Amhaz a/k/a Nisam Amhaz a/k/a Amin Shary a/k/a Musayn Ali Fa'ur a/k/a Husayn Ali Fa'ur a/k/a Musayn Ali Fa'ur	63	863	Saleh Ali Assi a/k/a Salih Ali Assi a/k/a Salah Assi a/k/a Saleh Ali Asi a/k/a Salih Ali Asi a/k/a Salah Ali Asi
Adham Hussein Tabaja a/k/a Adham Tabajah a/k/a Adham Husayn Tabaja a/k/a Adham Husayn Tabajah (ادعم صبين طباع العرب المعالم التعالم المعالم ا	32	732	
Tissam Amhaz a/k/a Tissam Muhammad Amhaz a/k/a Tisam Amhaz (عمار معده الهواء الملاء ا	89	689	Adham Hussein Tabaja a/k/a Adham Tabajah a/k/a Adham Husayn Tabaja a/k/a Adham Husayn
Amin Muhammad Cherri a/k/a Amin Muhammad Shary a/k/a Amin Shari a/k/a Amin Shary a/k/a Amin Muhammad a/k/a Amen Shiri a/k/a Amin Shiri a/k/a Husayn Ali Faour a/k/a Mustafa Reda Darwish Faouz a/k/a Mustafa Reda Darwish Fawaz a/k/a Mustafa Reda Darwish Fawaz a/k/a Mustafa Fawaz a/k/a	8.4	884	
### Ali Muhammad Tajideen a/k/a Kassem Muhammad Tajideen a/k/a Kassim Muhammad Tajideen a/k/a Kassem Muhammad Tajideen a/k/a Cassei Muhammad Tajideen a/k/a Caseen Muhammad Tajideen a/k/a Caseen Muhammad Tajideen a/k/			Amin Muhammad Cherri a/k/a Amin Muhammad Shary a/k/a Amin Shari a/k/a Amin Shary a/k/a Amin Muhammad
Mustafa Reda Darwish Fawaz a/k/a Mustapha Reda Darwish Fawaz a/k/a Mustapha Reda Darwish Fawaz a/k/a Mustafa Fawaz a/k/a Mustapha Fawaz a/k/a Mustapha Rida Darwish-Fawaz a/k/a Mustafa Fawaz a/k/a Mustapha Rhoda Darwich Fawaz a/k/a Mustafa Fawaz a/k/a Mustapha Rhoda Darwich Fawaz a/k/a Mustafa Habib Harb (ميل المعلم الم	16	716	a/k/a Housein Ali
Mostafa Habib Harb a/k/a Mustafa Habib Harb (مصطنى حبيب حرب) Kassem Hejeij a/k/a Kassem Muhammad Hejeij a/k/a Kassem Hajij a/k/a Kassem Hujayj a/k/a Qassem Hejeij a/k/a Qassim Hejeij a/k/a Qassem Hajij a/k/a Qassem Hujayj a/k/a Qasem Muhammad Tajideen a/k/a Qasem Hujayj a/k/a Ali Muhammad Tajideen a/k/a Ali Muhammad Tajideen a/k/a Qassem Muhammad Tajideen a/k/a Qassem Muhammad Tajideen a/k/a Qassim Muhammad Tajideen a/k/a Qassim Muhammad Tajideen a/k/a Qassem Hujayi a/k/a Qassem Muhammad Tajideen a/k/a Qassem	739 , 2057	1364, 1739	Mustafa Reda Darwish Fawaz a/k/a Mustapha Reda Darwish Fawaz a/k/a Mustapha Reda Darwish Fawaz a/k/a Moustafa Reda Darwish-Fawaz a/k/a Mustafa Fawwaz a/k/a Mustapha Fawaz a/k/a Mustapha Rida Darwich Fawaz a/k/a Mostafa Reda Darwich Fawaz a/k/a Mustapha Rhoda Darwich Fawaz a/k/a
Kassem Hejeij a/k/a Kassem Muhammad Hejeij a/k/a Kassem Hajij a/k/a Kassem Hujayj a/k/a Qasem Hejeij a/k/a Qasem Hajij a/k/a Qasem Hajij a/k/a Qasem Hujayj a/k/a Qasem Muhammad Tajideen a/k/a Qasem Muhammad Tajideen a/k/a Qasem Muhammad Tajideen a/k/a Kassem Muhammad Tajideen a/k/a Qasem Hujayj a/k/a Qasem Hujayj a/k/a Qasem Hujayj a/k/a Qasem Muhammad Tajideen a/k/a Qasem Muhammad Tajideen a/k/a Qasem Muhammad Tajideen a/k/a Qasem Muhammad Tajideen a/k/a Qasem Hujayj a/k/a Ahmad Yazbek (احمد محدد براب المرض عاده) Ahmad Mohamad Yazbeck a/k/a Ahmah Yazbeck a/k/a Ahmad Yazbek (احمد محدد براب الرض عاده) Ahmad Mohamad Yazbeck a/k/a Ahmah Yazbeck a/k/a Ahmad Yazbek (احمد محدد براب الرض عاده) Ezzat Youssef Akar a/k/a Izzat Akar a/k/a Izzat Youssef Akar a/k/a Izzat Yusif Akkar Qasim Ulayq a/k/a	49	649	(عباس حسن غریب) Abbas Hassan Gharib
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